IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

JOINT MOTION TO DISMISS DEFENDANT C.R. BARD, INC. WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibits A-C and Defendant C.R. Bard, Inc. ("Bard") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station, 201 17th Street, NW
Suite 1700
Atlanta, GA 30363
(404) 322-6000
Attorney for Defendant C.R. Bard, Inc.

/s/ Seth S. Webb BROWN & CROUPPEN Suite 1600 211 North Broadway St. Louis, MO 63102 314/421-0216

Fax: 314/421-4061

Email: sethw@getbc.com

Attorney for Plaintiffs on Exhibit A

/s/ Regina S. Johnson LOPEZ MCHUGH 214 Flynn Avenue Moorestown, NJ 08057 856/273-8500

Fax: 856/273-8502

Email: rjohnson@lopezmchugh.com Attorney for Plaintiffs on Exhibit B

/s/ Andrew J. Fink SOLIS LAW FIRM 5310 West Cermak Road Cicero, IL 60804 708/795-0400

Fax: 708/652-4711

Email: transvaginal.mesh.solis@gmail.com

Attorney for Plaintiffs on Exhibit C

Dated: August 20, 2018

EXHIBIT A – BROWN & CROUPPEN

CIVIL ACTION NUMBER	CASE NAME
(listed numerically in	
ascending order)	
2:13-cv-10948	Mary Wenger and James Wenger v. C.R. Bard, Inc., et al.

EXHIBIT B – LOPEZ MCHUGH

CIVIL ACTION NUMBER	CASE NAME
(listed numerically in	
ascending order)	
_	
2:13-cv-25636	Amy Marie Jansen v. C.R. Bard, Inc., et al.

EXHIBIT C – SOLIS LAW FIRM

CIVIL ACTION NUMBER	CASE NAME
(listed numerically in	
ascending order)	
2:13-cv-13664	Graciela Bonilla and Freddy Bonilla v. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.